

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Notice of Proposed Rulemaking)	
18 FCC Rcd 13187, 13188 ¶1 (2003))	ET Docket No. 03-137
)	
And)	
)	
Service Rules for the Advanced Wireless Services)	WT Docket No. 12-357
H Block---Implementing Section 6401 of the)	
Middle Class Tax Relief and Job Creation Act of)	
2012 Related to the 1915-1920 MHz and)	
1995-2000 MHz Bands ¶53 footnote 95)	

To: Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Comment Filed by:
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Feb 5, 2013

AFFIDAVIT OF Cynthia Edwards

State of Michigan

County of Washtenaw

I, Cynthia Edwards, attest that my statements are true to the best of my knowledge.

Comment round for ET Docket No. 03-137 and WT Docket No. 12-357.

1. My name is Cynthia Edwards—. My address is 1985 Upland Dr. Ann Arbor MI 48105.

2. I work in retail sales and landscaping.

3. I am writing to comment on the existing FCC guidelines for smart meters because the radio frequencies coming from SmartMeters are making me sick, as they are many other people. Once the meters started being installed in my city in 2012, I began having trouble sleeping, developed a loud ringing in my ears, started feeling exhausted all the time, have experienced brain fog and an inability to concentrate, and my irregular heartbeat that had been under control suddenly was wildly irregular, and nothing has been able to stop it. This is terrifying because it predisposes me for a stroke or heart attack. All of this is putting my health and my life at risk. This is completely unacceptable and I want to know why my government is not protecting my life.

I am writing to demand that the FCC take responsibility for the mess it has allowed to happen and for putting my life at risk. I demand that the installation of smart meters and digital meters be stopped immediately until independent research can be done and ALL the research taken into account, not just that done by the industry.

Several people in my community have had to move out of their houses because of becoming so ill after the meters were installed. Many others are now constantly ill. People's blood pressures have spiked and they have had to go on medication to controll it. A young boy with juvenile diabetes, which had been completely under control, had his numbers spike into the danger zone. ALL OF THIS HAPPENED DIRECTLY AFTER SMART METERS WERE INSTALLED.

It is important to note that it is not only the RF smart meters but the digital meters that are causing these problems as well. And there seem to be no regulations regarding these meters at all. In Michigan , DTE is forcing the removal of analog meters and the installation of the digital meters, even if a person is opting out of the smart meter installation. Consumer's Energy is allowing analog meters to be retained so there is clearly no reason for DTE's absolute refusal to do this. THESE DIGITAL METERS ARE ALSO MAKING PEOPLE SICK AND NEED TO BE REGULATED.

There are as many as 8% of the population who are technically "electronically sensitive". The Americans With Disabilities Act recognizes

electronic sensitivity as a legitimate disability and yet smart meters and digital meters are making their lives a living hell. This means that the FCC standards are allowing a violation of the ADA. This cannot be allowed to continue.

Current FCC guidelines are based on physics and engineering rather than biological studies, which has nothing to do with the reality being faced by humans and other animals, birds, insects etc.

The guidelines currently used by the FCC were adopted in 1996, are thermally based, and are believed to protect against injury that may be caused by acute exposures that result in tissue heating or electric shock. FCC guidelines have a much lower certainty of safety than standards. Meeting the current FCC guidelines only assures that one should not have heat damage from SmartMeter exposure. It says nothing about safety from the risk of many chronic diseases that the public is most concerned about such as cancer, miscarriage, birth defects, semen quality, autoimmune diseases, etc. Therefore, when it comes to nonthermal effects of RF, FCC guidelines are irrelevant and cannot be used for any claims of SmartMeter safety unless heat damage is involved (Li, 2011).

There is no scientific literature on the health risks of SmartMeters in particular as they are a new technology. However, there is a large body of research on the health risks of EMFs. Much of the data is concentrated on cell phone usage and as SmartMeters occupy the same energy spectrum as cell phones and depending on conditions, can exceed the whole body radiation exposure of cell phones. In terms of health risks, the causal factor under study is RF radiation whether it be from cell phones, Wi-Fi routers, cordless phones, or SmartMeters. Therefore all available, peer-reviewed, scientific research data can be extrapolated to apply to SmartMeters, taking into consideration the magnitude and the intensity of the exposure.

Since the mid-1990's the use of cellular and wireless devices has increased exponentially exposing the public to massively increased levels of RF. There is however, debate regarding the health risks posed to the public given these increased levels of radiation. It must be noted that there is little basic science funding for this type of research and it is largely funded by industry. An intriguing divide, noted by Genuis, 2011 is that most research carried out by independent non-government or non-industry affiliated researchers suggests potentially serious effects from many non-ionizing radiation exposure. Research funded by industry and some governments seems to cast doubt on the potential for harm. Elements of the controversy stem from inability to replicate findings consistently in laboratory animal studies. However, analysis of many of the conflicting studies is not valid as the methodology used is not comparable. Despite this controversy, evidence is accumulating on the results of exposure to RF at non-thermal levels including increased permeability of the blood-brain barrier in the head (Eberhardt, 2008), harmful effects on sperm, double strand breaks in DNA which could lead to cancer genesis (Phillips, 2011), stress gene activation indicating an exposure to a toxin (Blank, 2011), and alterations in brain glucose metabolism (Volkow, 2011).

There are no current, relevant public safety standards for pulsed RF involving chronic exposure of the public, nor of sensitive populations, nor of people with metal and medical implants that can be affected both by localized heating and by electromagnetic interference (EMI) for medical wireless implanted devices. Many other countries (9) have significantly lower RF/MW exposure standards ranging from 0.001 to 50 \sim W/cm² as compared with the US guideline of 200-1 000 \sim W/cm². Note that these recommended levels are considerably lower than the approximately 600 \sim W/cm² (time-averaged) allowed for the RFR from SmartMeters operating in the low 900 MHz band mandated by the FCC based on only thermal consideration. In summary, there is no scientific data to determine if there is a safe RF exposure level regarding its non-thermal effects. The question for governmental agencies is that given the uncertainty of safety, the evidence of existing and potential harm, should we err on the side of safety and take the precautionary avoidance measures?

The two unique features of SmartMeter exposure are: 1) universal exposure thus far because of mandatory installation ensuring that virtually every household is exposed; 2) involuntary exposure whether one has a SmartMeter on their home or not due to the already ubiquitous saturation of installation in every community. Governmental agencies for protecting public health and safety should be much more vigilant towards involuntary environmental exposures because governmental agencies are the only defense against such involuntary exposure.

My health and my life are in danger and I am asking the FCC to do the right thing –

- 1. Stop the use of SmartMeters and digital meters IMMEDIATELY until independent research is done and real safety standards can be created**
- 2. Require that power companies install shielding on every house and business to protect people from the RF they are now constantly exposed to.**
- 3. Require testing of both Smart Meters and digital meters on a variety of homes around the country and NOT IN A LABORATORY, so that the problems they are creating can be seen and understood where they are happening, in relation to the huge amount of RF coming from Cell towers, WiFi, portable phones, etc.**

Respectfully submitted by

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